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Attorneys for Defendant  
TIMEC COMPANY, INC. d/b/a TRANSFIELD  
SERVICES, LTD.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JOSEPH VIERRA and KEVIN  
WOODRUFF, on behalf of themselves and  
classes of those similarly situated,

Plaintiffs,

vs.

TIMEC COMPANY, INC. and  
TRANSFIELD SERVICES, LTD., and  
DOES 1 through 100 Inclusive,

Defendants.

CASE NO. 3:14-CV-04105-EMC

**STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING DATE TO  
COMPLETE PRIVATE MEDIATION BY  
ONE WEEK**

1  
2 Plaintiffs JOSEPH VIERRA and KEVIN WOODRUFF and Defendant TIMEC  
3 COMPANY, INC. d/b/a TRANSFIELD SERVICES, LTD., through their undersigned counsel  
4 hereby stipulate as follows, and request that the time for completing private mediation be extended  
5 by one week to September 22, 2015.

6 WHEREAS, this is a putative wage hour class action involving in excess of a  
7 thousand putative class members; and

8 WHEREAS, this case was filed on September 10, 2014, and the FAC was filed on  
9 December 2, 2014; and

10 WHEREAS, at the first case management conference held on January 22, 2015 the  
11 Court referred the matter to private mediation, which was to be completed by September 15, 2015  
12 (ECF No. 29 , Minute Order); and

13 WHEREAS, the parties acted promptly after the case management conference to  
14 select a mediator experienced in wage hour class action settlements, Jeffrey A. Ross Employment  
15 Mediation in Oakland , California; and

16 WHEREAS, the parties attempted to secure a mediation date prior to September 15  
17 from the mediator, but he was setting mediation dates many months in advance, and the earliest date  
18 he was available that worked for the parties and their counsel was September 22, 2015; and

19 WHEREAS, on April 7, 2015 the mediator set the mediation date for September 22,  
20 2015; and

21 WHEREAS, the parties had hoped that a cancellation in the mediator's schedule  
22 might allow them to mediate earlier, if necessary preparation for the mediation was completed, but  
23 this has not occurred, and the mediation is still scheduled for September 22, 2015; and

24 WHEREAS, preparation for the mediation has required the retention of an expert by  
25 Defendant to analyze its payroll records and provide detailed summaries and calculations which the  
26 parties believe are necessary for a meaningful mediation, which have, to the extent necessary for a  
27 meaningful mediation, been shared with Plaintiffs' counsel on a confidential mediation privileged  
28 basis, but which was time consuming and costly to prepare, and Defendant and Plaintiffs are still  
diligently working with their respective experts to prepare for the mediation; and

WHEREAS, despite diligent efforts of the parties, it does not appear possible to complete the mediation by September 15, 2015.

WHEREFORE, the parties request that the Court extend by one week to September 22, 2015 the time to complete private mediation.

DATED: September 10, 2015

/s/ Robert L. Zaletel  
LINDERBERGH PORTER  
ROBERT L. ZALETEL  
TARUN MEHTA  
LITTLER MENDELSON, P.C.

Attorneys for Defendant  
TIMEC COMPANY, INC. d/b/a  
TRANSFIELD SERVICES, LTD

DATED: September 10, 2015

/s/ John T. Mullan  
JOHN T. MULLAN  
RUDY, EXELROD, ZIEFF & LOWE, L.L.P.

Attorneys for Plaintiffs  
JOSEPH VIERRA and KEVIN WOODRUFF,  
on behalf of themselves and classes of those  
similarly situated

~~PROPOS~~  
[PROPOSED] ORDER

For good cause appearing, the parties shall complete private mediation by  
September 22, 2015.

DATED: 9/11/15 \_\_\_\_\_

